

1 BILL LOCKYER, Attorney General
of the State of California
2 LAWRENCE MERCER (S.B. #111898)
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Attorneys for Complainant
6

7
8 **BEFORE THE**
BOARD OF PSYCHOLOGY
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA
10

11 In the Matter of the Accusation Against)

Case No. W240

12 Ian Wickram, Ph.D.
2041 Superior Court
13 Tracy, CA 95304
(Address of Record)
14)

DEFAULT DECISION

15 Psychologist's License No. PSY 15096
16)

Respondent.
17)
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19)
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22)
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27)

JURISDICTION

19 On September 11, 2002, Accusation No. W240 was issued by the Board of
20 Psychology, Department of Consumer Affairs, State of California, (hereinafter the "Board")
21 against Ian Wickram, Ph.D. (hereinafter "respondent") alleging sexual misconduct and
22 conviction of a crime substantially related to the qualifications and functions of a psychologist.
23 A true and correct copy of the Accusation is attached hereto as Exhibit A.

24 On September 11, 2002, an employee of the Board caused the Accusation
25 against respondent, together with the Statement to Respondent, Request for Discovery, copy of
26 Government Code sections 11507.5, 11507.6 and 11507.7, Disciplinary Guidelines, and form
27 Notice of Defense to be sent to respondent at the following addresses:

1 1. 2041 Superior Court, Tracy, CA 95304 (address of record on file with
2 the Board) via U.S. Mail (certified mail, return receipt requested) as provided by Government
3 Code sections 11503 and 11505, and Business and Professions Code section 124.

4 2. C/O John Casenave, Esq., Noonan & Casenave, 121 East 11th Street,
5 Tracy, CA 95376 (office address of respondent's attorney) via U.S. Mail.

6 On September 20, 2002, the Board received the certified/return receipt from the
7 postal service indicating that service of the accusation and related documents was accomplished
8 at respondent's address of record. There was no response from Dr. Wickram.

9 On October 25, 2002, the Office of the Attorney General sent a Notice of
10 Default to respondent at his address of record via U.S. Mail (certified mail, return receipt
11 requested as well as First Class Mail). A courtesy copy of the Notice of Default was also
12 served upon respondent's attorney at his office address (certified mail, return receipt requested
13 as well as First Class Mail). On October 28, 2002, the return receipt on the service of Notice
14 of Default on respondent's attorney was received by the Office of the Attorney General. On
15 November 7, 2002, the return receipt on the service of Notice of Default on respondent was
16 received by the Office of the Attorney General. Copies of the return receipts are attached as
17 Exhibits B (Accusation) and C (Default) and a copy of the Notice of Default is attached as
18 Exhibit D.

19 The method of notice was reasonably calculated to give the licensee notice and
20 satisfies the requirements of Government Code section 11505. Respondent has not contacted
21 the Board or returned the Notice of Defense. The Board has determined that respondent is in
22 default and that respondent has waived his right to a hearing and to contest the merits of the
23 Accusation. Pursuant to Business and Professions Code section 11520, the Board of
24 Psychology is authorized to enter the following decision without a hearing.

25 Accordingly the Board of Psychology makes the following Findings of Fact,
26 Determination of Issues and Order with regard to License No. PSY 15096, issued to
27 respondent Ian Wickram, Ph.D.

FINDINGS OF FACT

The Board now makes the following findings of fact:

1. Thomas S. O'Connor, complainant herein, was the Executive Officer of the Board of Psychology, State of California, and made the charges and allegations in the Accusation solely in his official capacity.

2. At all times material herein, respondent Ian Wickram, Ph.D., has held Psychologist's License No. PSY 15096, which was issued to him by the Board on or about March 4, 1997. The license expired on October 31, 2001 and has not been renewed.

Patient T.D.

3. Beginning in or about January, 2001, Patient T.D. began seeing respondent for treatment of an industrial arm and wrist injury with biofeedback and therapeutic modalities.

4. Over the following months, respondent initiated a process that he stated was intended to "desensitize" the patient, first by asking her to remove articles of clothing and, later, by having her submit to physical touching by respondent.

5. Beginning in or about November or December 2001, respondent advised Patient T.D. that they would need to meet outside the office as part of her treatment. Respondent met with Patient T.D. in restaurants and took her to his apartment. Respondent had increased the sexual content of their interaction over time, representing that the sexual component was part of the treatment. On one occasion, respondent recommended that the patient read a book which discussed female masturbation. When the patient did not read the book, respondent told her that she was "non-compliant" with her "treatment."

6. In January, 2002, respondent increased the amount of intimate physical touching which occurred during sessions, as well as the frequency with which he met with the patient at his apartment. To persuade Patient T.D. to comply, respondent told her that she was sexually repressed and that this unorthodox therapy would assist her in overcoming the chronic pain resulting from the industrial injury.

7. In February, 2002, the physical intimacy culminated in sexual intercourse, again at respondent's apartment. Respondent advised Patient T.D. that he was her friend, her doctor and her lover. He told T.D. that the sex acts would help desensitize her and would alleviate her chronic pain. Respondent told T.D. that she had repressed memories of child sexual abuse by her father and that sexual intercourse with respondent was a form of role-playing therapy calculated to address her childhood trauma. Respondent admonished T.D. that this therapy was a secret and that she should not tell anyone about it. When T.D. discussed seeing other therapists, respondent told her that she would be wasting their time and that other therapies would set her back in her treatment. Respondent told T.D. that the worker's compensation representatives believed her to be a fake and, should she discontinue treatment with him, he would be forced to testify against her and would have to reveal her "whole life."

8. After suffering many months of sexual abuse by respondent, Patient T.D. went to the Palo Alto Police and made full report of his misconduct. A true and correct copy of the police report is attached hereto as Exhibit E and a statement from Patient T.D. is filed under seal with the Board of Psychology as Exhibit F.^{1/}

Patient H.D.

9. In or about October, 1999, H.D. began receiving treatment from respondent for biofeedback treatment, hypnosis and psycho-physiological therapy for pain and numbness to her arms and hands.

10. In November and December, 1999, respondent began making sexual comments and questioned H.D. about her sexual experiences. H.D. told respondent that she was a virgin. Respondent told H.D. that she was sexually repressed and that this was one cause of her physical complaints. In late January and February, 2000, respondent moved

1. Patient's identities are withheld to protect privacy. Respondent was given the opportunity to discover this information, but failed to file a Notice of Defense or to request additional information.

1 physically closer to H.D. during sessions and, during some sessions, would disconnect the
2 biofeedback monitor and hold H.D. for the entire session. Respondent told H.D. that he had
3 sexual feelings toward her and that, although such behavior was unethical and illegal, their
4 relationship transcended normal boundaries.

5 11. Respondent's conduct with Patient H.D. became explicitly sexual in
6 therapy sessions occurring between February and April, 2000, and therapy sessions involved
7 disrobing, mutual sexual touching and, ultimately, sexual intercourse. Respondent told Patient
8 H.D. that their sexual relationship was treatment which would benefit her physical complaints,
9 as well as improve her romantic relationship with her boyfriend.

10 12. When Patient H.D. complained about the sexual component of the
11 treatment, respondent told her that it was experimental and not yet generally accepted, but that
12 she would need to continue if she wanted to get better. At a later point in time, respondent
13 advised H.D. his wife suspected his infidelity and that their sexual relationship would have to
14 end, which decision H.D. accepted with some relief. However, respondent's misconduct
15 continued. In mid-2000, respondent met with Patient H.D. in her hotel room, at which time he
16 physically forced her to engage in sexual intercourse. Despite her fears that her condition
17 would worsen if she discontinued treatment with respondent, H.D. did stop scheduling visits.

18 13. After Patient H.D. discontinued her treatment with respondent, he left
19 her e-mail and telephone messages in which he told H.D. that he was ahead of his time in his
20 treatment methods and that people would not understand if H.D. told anyone what had
21 transpired between the two of them. Respondent urged H.D. not to discuss his treatment
22 methods with anyone. A true and correct copy of Patient H.D.'s sworn statement is filed
23 under seal with the Board of Psychology as Exhibit G.

24 Conviction of Crime

25 14. On August 30, 2002, respondent entered a plea of nolo contendere to a
26 felony count of patient sexual exploitation of Patients T.D. and H.D. in violation of Business
27 and Professions Code §729. A certified copy of respondent's plea and conviction are attached

hereto as Exhibit H.

DETERMINATION OF ISSUES

I

15. Respondent's conduct constitutes a violation of Business and Professions Code §§ 729 and 2960(o) in that respondent engaged in an exploitative sexual relationship with patients T.D. and H.D. while they were his patients as set forth in Findings of Facts 1 through 14, inclusive, above. Respondent's license is subject to disciplinary action for the reasons stated above and cause for revocation is established.

II

16. Respondent's conduct constitutes a violation of Business and Professions Code §§ 729 and 2960(a) in that respondent was convicted of a crime substantially related to the qualifications, functions and duties of a psychologist, in that respondent was convicted of patient sexual exploitation on August 30, 2002. Respondent's license is subject to disciplinary action for the reasons stated above and cause for revocation is established.

III

17. Complainant has incurred Twelve Thousand Four Hundred Fifty Six Dollars and Seventy-Four Cents (\$12,456.74) in enforcement costs, including costs of investigation and attorneys' fees, which costs were reasonably incurred in the prosecution of the case. A copy of a declaration of actual investigative hours spent on the case is attached hereto as Exhibit I. A copy of a declaration of prosecution costs is attached hereto as Exhibit J.

MOTION TO SEAL EXHIBITS

18. Complainant Thomas S. O'Connor moves to have the victims' statements, which contain the victims' identities as well as their personal and psychological histories, sealed and made unavailable to the public except upon order of the court. The motion is reasonably intended to protect the victims' identities and their rights of privacy and is granted. Copies of Exhibits F and G shall be placed in sealed envelopes and the contents of those envelopes shall not be released to the public except upon order of the court.

//

ORDER

WHEREFORE, the following order is hereby made:


1. Psychologist License No.PSY 15096, heretofore issued to respondent Ian Wickram, Ph.D., is hereby revoked separately and severally as to each of the Determination of Issues I and II set forth above.

2. Respondent shall pay reasonable costs of prosecution and enforcement as set forth in Determination of Issues III above.

3. The declarations of T.D. and H.D. are sealed and shall not be provided to any person or entity except pursuant to an order from a court of competent jurisdiction.

This decision shall become effective on January 17, 2003.

IT IS SO ORDERED this 18th day of December, 2002.


BOARD OF PSYCHOLOGY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA
PAMELA HARMELL, Ph.D., PRESIDENT

Attachments: Exhibits A, B, C, D, E,
F (under seal),
G (under seal),
H, I and J

EXHIBIT A

1 BILL LOCKYER, Attorney General
of the State of California
2 LAWRENCE A. MERCER, State Bar No. 111898
Deputy Attorney General
3 California Department of Justice
455 Golden Gate Avenue, Suite 11000
4 San Francisco, CA 94102-7004
Telephone: (415) 703-5539
5 Facsimile: (415) 703-5480

6 Attorneys for Complainant

FILED
STATE OF CALIFORNIA
BOARD OF PSYCHOLOGY
SACRAMENTO September 11 20 02
BY M. Gaedemarm ANALYST

7
8 **BEFORE THE**
BOARD OF PSYCHOLOGY
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. W240

12 IAN E. WICKRAM, PH.D.
2041 Superior Court
Tracy, CA 95304

ACCUSATION

13 License No. PSY15096

14 Respondent.

15
16 Complainant alleges:

17 PARTIES

18 1. Thomas S. O'Connor (Complainant) brings this Accusation solely in his
19 official capacity as the Executive Officer of the Board of Psychology, Department of Consumer
20 Affairs.

21 2. On or about March 4, 1997, the Board of Psychology issued License
22 Number PSY15096 to Ian E. Wickram, Ph.D. (Respondent). The License was in full force and
23 effect at all times relevant to the charges brought herein and will expire on October 31, 2002,
24 unless renewed.

25 JURISDICTION

26 3. This Accusation is brought before the Board of Psychology (Board), under
27 the authority of the following sections of the Business and Professions Code (Code).
28

1 4. Section 726 of the Code states, in part:

2 "The commission of any act of sexual abuse, misconduct, or relations with
3 a patient, client, or customer constitutes unprofessional conduct and grounds for
4 disciplinary action . . ."

5 5. Section 729 of the Code states, in part:

6 "Any . . . psychotherapist . . . who engages in an act of sexual intercourse,
7 sodomy, oral copulation, or sexual contact with a patient or client . . . is guilty of sexual
8 exploitation . . ."

9 6. Section 2960 of the Code states:

10 "The board may refuse to issue any registration or license, or may issue a
11 registration or license with terms and conditions, or may suspend or revoke the
12 registration or license of any registrant or licensee if the applicant, registrant, or licensee
13 has been guilty of unprofessional conduct. Unprofessional conduct shall include, but not
14 be limited to:

15 (a) Conviction of a crime substantially related to the qualifications, functions or
16 duties of a psychologist or psychological assistant.

17 . . . (o) Any act of sexual abuse, or sexual relations with a patient or former
18 patient within two years following termination of therapy, or sexual misconduct that is
19 substantially related to the qualifications, functions or duties of a psychologist or
20 psychological assistant or registered psychologist."

21 7. Section 125.3 of the Code states, in pertinent part, that the Board may
22 request the administrative law judge to direct a licentiate found to have committed a violation or
23 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
24 and enforcement of the case.

25 FIRST CAUSES FOR DISCIPLINE

26 (Sexual Misconduct)

27 8. Respondent is subject to disciplinary action under section 729 of the Code
28 in that respondent engaged in sexual contact and intercourse with two female patients. The

1 circumstances are as follows:

2 Patient T.D.¹

3 A. Beginning in or about January, 2001, Patient T.D. began seeing
4 respondent for treatment of an industrial arm and wrist injury with biofeedback
5 and therapeutic modalities.

6 B. Over the following months, respondent initiated a process that he stated
7 was intended to "desensitize" the patient, first by asking her to remove articles of
8 clothing and, later, by having her submit to physical touching by respondent.

9 C. Beginning in or about November or December 2001, respondent advised
10 Patient T.D. that they would need to meet outside the office as part of her
11 treatment. Respondent met with Patient T.D. in restaurants and took her to his
12 apartment. Respondent increased the sexual content of their interaction over time,
13 representing that the sexual component was part of the treatment. On one
14 occasion, respondent recommended that the patient read a book which discussed
15 female masturbation. When the patient did not read the book, respondent told her
16 that she was "non-compliant" with her "treatment."

17 D. In January, 2002, respondent increased the level of intimate physical
18 touching which occurred during sessions, as well as the frequency with which he
19 met with the patient at his apartment. To convince Patient T.D. to comply,
20 respondent told her that she was sexually repressed and that this unorthodox
21 therapy would assist her in overcoming the chronic pain resulting from the
22 industrial injury.

23 E. In February, 2002, the physical intimacy culminated in sexual intercourse,
24 again at respondent's apartment. Respondent advised Patient T.D. that he was her
25 friend, her doctor and her lover. He told T.D. that the sex acts would help
26

27 1. The initial D indicates Doe. Patients are referred to by such fictitious names to protect
28 privacy.

1 desensitize her and would alleviate her chronic pain. Respondent told T.D. that
2 this therapy was a secret and that she should not tell anyone about it.

3
4 Patient H.D.

5 F. In or about October, 1999, H.D. began receiving treatment from
6 respondent for biofeedback treatment, hypnosis and psycho-physiological therapy
7 for pain and numbness to her arms and hands.

8 G. In November and December, 1999, respondent began making sexual
9 comments and questioned H.D. about her sexual experiences. H.D. told
10 respondent that she was a virgin. Respondent told H.D. that she was sexually
11 repressed and that this was one cause of her physical complaints. In late January
12 and February, 2000, respondent moved physically closer to H.D. during sessions
13 and, during some sessions, would disconnect the biofeedback monitor and hold
14 H.D. for the entire session. Respondent told H.D. that he had sexual feelings
15 toward her and that, although such behavior was unethical and illegal, their
16 relationship transcended normal boundaries.

17 H. Respondent's conduct with Patient H.D. became explicitly sexual in
18 therapy sessions occurring between February and April, 2000, and therapy
19 sessions involved disrobing, mutual sexual touching and, ultimately, sexual
20 intercourse. Respondent told Patient H.D. that their sexual relationship was
21 treatment which would benefit her physical complaints, as well as improve her
22 romantic relationship with her boyfriend.

23 I. When Patient H.D. complained about the sexual component of the
24 treatment, respondent told her that it was experimental and not yet generally
25 accepted, but that she would need to continue if she wanted to get better. At a
26 later point in time, respondent advised H.D. his wife suspected his infidelity and
27 that their sexual relationship would have to end, which decision H.D. accepted
28 with some relief. However, respondent's misconduct continued. In mid-2000,

1 respondent met with Patient H.D. in her hotel room, at which time he physically
2 forced her to engage in sexual intercourse. Despite her fears that her condition
3 would worsen if she discontinued treatment with respondent, H.D. did stop
4 scheduling visits.

5 J. After Patient H.D. discontinued her treatment with respondent, he left her
6 e-mail and telephone messages in which he told H.D. that he was ahead of his
7 time in his treatment methods and that people would not understand if H.D. told
8 anyone what had transpired between the two of them. Respondent urged H.D. not
9 to discuss his treatment methods with anyone.

10 8. Respondent's treatment of Patients T.D. and H.D., as set forth in
11 Paragraph 7(A)-(J) constitutes sexual misconduct and sexual exploitation with a patient in
12 violation of Sections 726, 729 and 2960(o) of the Code.

13 SECOND CAUSE FOR DISCIPLINE

14 (Criminal Conviction)

15 9. Respondent is subject to disciplinary action under section 2960(a) in that
16 respondent was convicted of a felony substantially related to the qualifications, functions and
17 duties of a psychologist. The circumstances are as follows:

18 A. On or about August 30, 2002, respondent entered a plea of *nolo*
19 *contendere* to charges that he sexually exploited patients T.D. and H.D. in
20 violation of Business and Professions Code section 729, a felony.

21 PRAYER

22 WHEREFORE, Complainant requests that a hearing be held on the matters herein
23 alleged, and that following the hearing, the Board of Psychology issue a decision:

- 24 1. Revoking or suspending License Number PSY15096, issued to Ian E.
25 Wickram, Ph.D.;
- 26 2. Ordering Ian E. Wickram, Ph.D. to pay the Board of Psychology the
27 reasonable costs of the investigation and enforcement of this case, and, if placed on probation,
28 the costs of probation monitoring;

3. Taking such other and further action as deemed necessary and proper.

DATED: September 11, 2002



THOMAS S. O'CONNOR
Executive Officer
Board of Psychology
Department of Consumer Affairs
State of California
Complainant

03598160-sf2002ad0710
2Accusation.wpt 09/05/2002

EXHIBIT B

State of California
Department of Consumer Affairs

Memorandum

To: Lawrence A. Mercer
Deputy Attorney General
San Francisco

Date: September 20, 2002

From: Board of Psychology – Mary Laackmann, *M. Laackmann*
Enforcement Analyst, ATSS 435-2691 or (916) 268-2691

Subject: Ian E. Wickram, Ph.D.; W240

Enclosed is the original:

- () ACCUSATION
- () STATEMENT OF ISSUES
- () DECISION
- (✓) CERTIFIED MAIL TAG
- () ACCUSATION AND PETITION TO REVOKE PROBATION
- () NOTICE OF DEFENSE

Address of record:

2041 Superior Court
Tracy, CA 95304

OTHER COMMENTS:

Enclosed is the signed certifi

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ian E. Wickram, Ph.D.
2041 Superior Court
Tracy, CA 95304

2. Article Number

(Transfer from service label)

PS Form 3811, August 2001

COMPLETE THIS SECTION ON DELIVERY

A. Signature *Ian E. Wickram* ☐ Agent ☐ Addressee

B. Received by (Printed Name) *Ian E. Wickram* C. Date of Delivery *9/20/02*

D. Is delivery address different from item 1? ☐ Yes ☒ No
If Yes, enter delivery address below:

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes ☒ No

7001 2510 0001 2147 4074

Domestic Return Receipt 7 1222 102595

EXHIBIT C

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

John L. Casenave, Esq.
Noonan & Casenave
121 East 11th Street
Tracy CA 95376

4a. Article Number

7000 1670 0000 3176 2143

4b. Service Type

- ☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☒ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

2002

5. Received By: (Print Name)

Huerta

6. Signature: (Addressee or Agent)

X

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Ian Wickram, Ph.D.
2041 Superior Court
Tracy CA 95304

4a. Article Number

7000 1670 0000 3176 2150

4b. Service Type

- ☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☒ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

11-5-02

5. Received By: (Print Name)

Wickram, Ian

6. Signature: (Addressee or Agent)

Wickram, Ian

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

EXHIBIT D

1 BILL LOCKYER, Attorney General
of the State of California
2 LAWRENCE A. MERCER, State Bar No. 111898
Deputy Attorney General
3 California Department of Justice
455 Golden Gate Avenue, Suite 11000
4 San Francisco, California 94102
Telephone: (415) 703-5539
5 Facsimile: (415) 703-5480

6 Attorneys for Complainant

7
8 **BEFORE THE**
BOARD OF PSYCHOLOGY
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. W240

12 IAN WICKRAM, Ph.D.
2041 Superior Court
13 Tracy, CA 95304

NOTICE OF DEFAULT

14 License No. PSY15096

15 Respondent.

16
17 TO RESPONDENT IAN WICKRAM, Ph.D:

18
19 PLEASE TAKE NOTICE that service of an Accusation was duly made upon you in the
20 time and manner provided by law and that you failed to file a Notice of Defense as was required
21 of you. A copy of the Accusation is attached to this notice. **You must take immediate action**
22 **to request relief from default or you will forfeit important rights, including the right to**
23 **present a defense to the charges against you.** If you fail to take action to be relieved of the
24 default, the Board will enter a Default Decision against your license and your license may be
25 suspended or revoked without any hearing. You may also be required to pay attorneys' fees and
26 costs incurred by the Board in this disciplinary matter. You may present a request for relief from

27 //

28 //

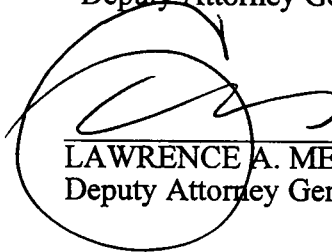
1 default to the Office of the Attorney General at the following address:

2
3 OFFICE OF THE ATTORNEY GENERAL
4 455 Golden Gate Avenue, Suite 11000
San Francisco, California 94102
Attention: Lawrence Mercer, DAG

5 Your request must be accompanied by a statement of facts setting forth the reasons why you
6 failed to respond to the Accusation. You may also contact an attorney and be represented by an
7 attorney at your own expense.

8 Dated: October 25, 2002

9 BILL LOCKYER, Attorney General
10 of the State of California
11 VIVIEN HARA HERSH, Supervising
Deputy Attorney General

12
13 
14 LAWRENCE A. MERCER
15 Deputy Attorney General
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DECLARATION OF SERVICE
(Certified Mail)

In the Matter of the Accusation Against: IAN WICKRAM, Ph.D.
Agency Case No. W240

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On October 25, 2002, I served the attached **NOTICE OF DEFAULT** by placing a true copy thereof enclosed in a sealed envelope as certified mail with postage thereon fully prepaid and return receipt requested, in the internal mail collection system at the Office of the Attorney General at San Francisco, addressed as follows:

Name

Certified No.

Ian Wickram, Ph.D.
2041 Superior Court
Tracy, CA 95304

7000 1670 0000 3176 2150
and by First Class Mail

John L. Casenave, Esq.
Noonan & Casenave
121 East 11th Street
Tracy, CA 95376

7000 1670 0000 3176 2143
and by First Class Mail

I declare under penalty of perjury under the laws of the State of California the foregoing is true
dated on October 25, 2002, at San Francisco

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (to be completed by mailer)

2041 Superior Court

Signature

EXHIBIT E

IN NUMBER | DATE

REPORT TYPE <input type="checkbox"/> SUPPLEMENTAL	PALO ALTO POLICE SUSPECT PAGE	CASE NUMBER 02-052-0232
Sex Crimes / Miscellaneous		

<input type="checkbox"/> BOOKED <input type="checkbox"/> CITED <input type="checkbox"/> 849(b) PC <input checked="" type="checkbox"/> COMPLAINT REVIEW <input type="checkbox"/> INFO ONLY <input type="checkbox"/> AT LARGE <input type="checkbox"/> VMC <input type="checkbox"/> SEE JCR									
S# 1	LAST, FIRST, MIDDLE Wickram, Ian	RACE A	SEX M	DOB 09-23-38	AGE	HT 5-09	WT 161	HAIR blk	EYES brn
AKA / MONIKER		RELATIONSHIP TO VICTIM psychotherapist		INTERPRETER NEEDED: <input type="checkbox"/> SPANISH <input type="checkbox"/> OTHER: <input type="checkbox"/> VIETNAMESE					
ADDRESS 2041 Superior Court		CITY/STATE Tracy, CA.		ZIP 94304		PHONE 209 / 834-0571		PFN	
BUSINESS / SCHOOL ADDRESS 1101 Welch Road		CITY/STATE Palo Alto / CA		ZIP 94303		PHONE 650/498-5566		PHOTO ID#	
DL NUMBER B6413212	STATE CA	SSN	CITE#		CEN				

CLOTHING # In Palo ALto 650/289-0706 # In Mt. View 650/941-1880 (apartments)					UNIQUE IDENTIFIERS (CII #)																													
HAIR STYLE <input type="checkbox"/> A. AFRO <input type="checkbox"/> B. BALD/SHAVED <input type="checkbox"/> D. BRAIDED <input type="checkbox"/> G. COLLAR <input type="checkbox"/> O. CREW CUT <input type="checkbox"/> F. LONG <input type="checkbox"/> H. PONY TAIL <input type="checkbox"/> P. PUNK <input checked="" type="checkbox"/> J. SHORT GLASSES <input checked="" type="checkbox"/> B. GLASSES <input type="checkbox"/> A. SUNGLASSES					HAIR TYPE <input type="checkbox"/> C. RECEDING <input checked="" type="checkbox"/> K. STRAIGHT <input type="checkbox"/> L. WAVY/CURLY <input type="checkbox"/> M. WIG/TOUPEE SPEECH <input checked="" type="checkbox"/> A. ACCENT <input type="checkbox"/> B. LISP <input type="checkbox"/> C. STUTTER					FACIAL HAIR <input type="checkbox"/> A. BEARD <input checked="" type="checkbox"/> E. CLEAN SHAVEN <input type="checkbox"/> B. FU MANCHU <input type="checkbox"/> C. GOATEE <input type="checkbox"/> H. LOWER LIP <input type="checkbox"/> D. MUSTACHE <input type="checkbox"/> J. SIDE BURNS <input type="checkbox"/> F. UNSHAVEN CLOTHING <input type="checkbox"/> B. CAP/HAT <input type="checkbox"/> G. GLOVES <input type="checkbox"/> E. MASK					BUILD <input type="checkbox"/> A. HEAVY <input type="checkbox"/> B. MEDIUM <input type="checkbox"/> C. MUSCULAR <input type="checkbox"/> D. POT BELLY <input type="checkbox"/> G. SMALL <input type="checkbox"/> E. THIN TEETH <input type="checkbox"/> D. GOLD <input type="checkbox"/> E. MISSING <input type="checkbox"/> G. ROTTEN <input type="checkbox"/> H. SILVER					COMPLEXION <input type="checkbox"/> A. ACNE/POCKED <input type="checkbox"/> B. DARK <input type="checkbox"/> C. FRECKLED <input type="checkbox"/> D. LIGHT <input checked="" type="checkbox"/> E. MEDIUM APPEARANCE <input type="checkbox"/> C. BODY ODOR <input type="checkbox"/> B. DISGUISE <input type="checkbox"/> A. UNKEMPT/DIRTY <input type="checkbox"/> D. WELL GROOMED <input type="checkbox"/> ADD'L, SEE NARRATIVE					WEAPONS <input type="checkbox"/> B. CUTTING INST. <input checked="" type="checkbox"/> C. HAND/FEET <input type="checkbox"/> K. REVOLVER <input type="checkbox"/> F. RIFLE <input type="checkbox"/> G. SEMI AUTO <input type="checkbox"/> H. SHOTGUN <input type="checkbox"/> D. SIMULATED <input type="checkbox"/> J. UNKNOWN <input type="checkbox"/> E. OTHER:					SCARS, MARKS, TATTOOS ETC. CODE: _____ LOC: _____ DESC _____ CODE: _____ LOC: _____ DESC _____ CODE: S= SCARS M= MARKS P= PIERCING T= TATTOO MB= MISSING BODY PTS.				
Signature per 837 P.C.																																		

<input type="checkbox"/> BOOKED <input type="checkbox"/> CITED <input type="checkbox"/> 849(b) PC <input type="checkbox"/> COMPLAINT REVIEW <input type="checkbox"/> INFO ONLY <input type="checkbox"/> AT LARGE <input type="checkbox"/> VMC <input type="checkbox"/> SEE JCR									
S#	LAST, FIRST, MIDDLE	RACE	SEX	DOB	AGE	HT	WT	HAIR	EYES
AKA / MONIKER		RELATIONSHIP TO VICTIM		INTERPRETER NEEDED: <input type="checkbox"/> SPANISH <input type="checkbox"/> OTHER: <input type="checkbox"/> VIETNAMESE					
ADDRESS		CITY/STATE		ZIP		PHONE		PFN	
BUSINESS / SCHOOL ADDRESS		CITY/STATE		ZIP		PHONE		PHOTO ID#	
DL NUMBER	STATE CA	SSN	CITE#		CEN				

CLOTHING					UNIQUE IDENTIFIERS (CII #)																													
HAIR STYLE <input type="checkbox"/> A. AFRO <input type="checkbox"/> B. BALD/SHAVED <input type="checkbox"/> D. BRAIDED <input type="checkbox"/> G. COLLAR <input type="checkbox"/> O. CREW CUT <input type="checkbox"/> F. LONG <input type="checkbox"/> H. PONY TAIL <input type="checkbox"/> P. PUNK <input type="checkbox"/> J. SHORT GLASSES <input type="checkbox"/> B. GLASSES <input type="checkbox"/> A. SUNGLASSES					HAIR TYPE <input type="checkbox"/> C. RECEDING <input type="checkbox"/> K. STRAIGHT <input type="checkbox"/> L. WAVY/CURLY <input type="checkbox"/> M. WIG/TOUPEE SPEECH <input type="checkbox"/> A. ACCENT <input type="checkbox"/> B. LISP <input type="checkbox"/> C. STUTTER					FACIAL HAIR <input type="checkbox"/> A. BEARD <input type="checkbox"/> E. CLEAN SHAVEN <input type="checkbox"/> B. FU MANCHU <input type="checkbox"/> C. GOATEE <input type="checkbox"/> H. LOWER LIP <input type="checkbox"/> D. MUSTACHE <input type="checkbox"/> J. SIDE BURNS <input type="checkbox"/> F. UNSHAVEN CLOTHING <input type="checkbox"/> B. CAP/HAT <input type="checkbox"/> G. GLOVES <input type="checkbox"/> E. MASK					BUILD <input type="checkbox"/> A. HEAVY <input type="checkbox"/> B. MEDIUM <input type="checkbox"/> C. MUSCULAR <input type="checkbox"/> D. POT BELLY <input type="checkbox"/> G. SMALL <input type="checkbox"/> E. THIN TEETH <input type="checkbox"/> D. GOLD <input type="checkbox"/> E. MISSING <input type="checkbox"/> G. ROTTEN <input type="checkbox"/> H. SILVER					COMPLEXION <input type="checkbox"/> A. ACNE/POCKED <input type="checkbox"/> B. DARK <input type="checkbox"/> C. FRECKLED <input type="checkbox"/> D. LIGHT <input type="checkbox"/> E. MEDIUM APPEARANCE <input type="checkbox"/> C. BODY ODOR <input type="checkbox"/> B. DISGUISE <input type="checkbox"/> A. UNKEMPT/DIRTY <input type="checkbox"/> D. WELL GROOMED <input type="checkbox"/> ADD'L, SEE NARRATIVE					WEAPONS <input type="checkbox"/> B. CUTTING INST. <input type="checkbox"/> C. HAND/FEET <input type="checkbox"/> K. REVOLVER <input type="checkbox"/> F. RIFLE <input type="checkbox"/> G. SEMI AUTO <input type="checkbox"/> H. SHOTGUN <input type="checkbox"/> D. SIMULATED <input type="checkbox"/> J. UNKNOWN <input type="checkbox"/> E. OTHER:					SCARS, MARKS, TATTOOS ETC. CODE: _____ LOC: _____ DESC _____ CODE: _____ LOC: _____ DESC _____ CODE: S= SCARS M= MARKS P= PIERCING T= TATTOO MB= MISSING BODY PTS.				
Signature per 837 P.C.																																		

SUSPECT VEHICLE SUSPECT #	YEAR	MAKE	MODEL	BODY TYPE	COLOR	LICENSE/VIN	STATE CA
ADDITIONAL IDENTIFIERS: <input type="checkbox"/> LOWERED <input type="checkbox"/> RAISED <input type="checkbox"/> SPECIAL PAINT <input type="checkbox"/> SPECIAL WHEELS <input type="checkbox"/> SUN ROOF/T-OP							
RO'S NAME (LAST, FIRST, MIDDLE) <input type="checkbox"/> SAME AS SUSPECT #		ADDRESS		CITY/STATE		ZIP	UNIQUE VEHICLE IDENTIFIERS
SUSPECT VEHICLE WAS: <input type="checkbox"/> STOLEN <input type="checkbox"/> IMPOUNDED <input type="checkbox"/> STORED <input type="checkbox"/> LEFT AT SCENE <input type="checkbox"/> RELEASED AT SCENE <input type="checkbox"/> HELD F/PRINTS <input type="checkbox"/> PRINTED							
OFFICER'S NAME	ID NUMBER	DATE	WATCH/DIVISION	SUPERVISOR REVIEW	ID	DATE	

REPORT TYPE <input type="checkbox"/> SUPPLEMENTAL SEX CRIMES / MISC.	PALO ALTO POLICE PROPERTY	CASE NUMBER 02.052.0232	<input checked="" type="checkbox"/> ORIGINAL <input type="checkbox"/> HEALTH HAZARD
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SOURCE CODE: "F" = FINDER "O" = OWNER "S" = SUSPECT "V" = VICTIM

SOURCE LAST, FIRST, MIDDLE (FIRM, IF BUSINESS)

<input type="checkbox"/> STATE OF CA S. WICKRAM . IAN	<input type="checkbox"/> PAPD
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U. PC 293	
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PROPERTY CODES	D = DISPOSAL REQUEST S/R = STOLEN/RECOVERED E = EVIDENCE S = STOLEN F = FOUND R = RECOVERED K = SAFEKEEPING O = UNDER OBSERVATION	<input type="checkbox"/> SEARCH WARRANT <input type="checkbox"/> FINDER'S CLAIM <input type="checkbox"/> 5150 / 8102 W&I <input type="checkbox"/> D.V. / 12028.5	LOCATION CODES	L - # = LOCKER NUMBER F = FREEZER R = REFRIGERATOR V = VICTIM HOLD C = CAGE
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ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
1.	E	O	2	AUDIO/VIDEO TAPE	MAXELL		
SERIAL NUMBER				LOCATION COLLECTED	VALUE	LOC CODE	PROCESS EVIDENCE
				@ PAPD ISD INTERVIEW ROOM			<input type="checkbox"/>

DESCRIPTION
INITIAL INTERVIEW 2.21.02

ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
2.	E	V	1.	MICRO CASSETTE	SONY	MC-60	
SERIAL NUMBER				LOCATION COLLECTED	VALUE	LOC CODE	PROCESS EVIDENCE
				FROM VICTIM CELL + HOME PHONE			<input type="checkbox"/>

DESCRIPTION
RECORDED CALLS FROM S. TO V.

ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
3	E	O	2	AUDIO TAPES	MAXELL		
SERIAL NUMBER				LOCATION COLLECTED	VALUE	LOC CODE	PROCESS EVIDENCE
				@ PAPD ISD INTERVIEW ROOM			<input type="checkbox"/>

DESCRIPTION
SECONDARY INTERVIEW 2.25.02

ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
4	E	S	1	TAPE FROM PRETEXT CALL	MAXELL		
SERIAL NUMBER				LOCATION COLLECTED	VALUE	LOC CODE	PROCESS EVIDENCE
				FROM V. HOME			<input type="checkbox"/>

DESCRIPTION
2/26/02 PRETEXT CALL V -> S

ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
5	E	S	1	"	MAXELL		
SERIAL NUMBER				LOCATION COLLECTED	VALUE	LOC CODE	PROCESS EVIDENCE
				"			<input type="checkbox"/>

DESCRIPTION
2/27/02 "

ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
#6	E	S	1	CASSETTE TAPE	SONY	MC-90	
SERIAL NUMBER				LOCATION COLLECTED	VALUE	LOC CODE	PROCESS EVIDENCE
				"			<input type="checkbox"/>

DESCRIPTION

ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
#7	E	S	1	TAPE	MAXELL		
SERIAL NUMBER				LOCATION COLLECTED	VALUE	LOC CODE	PROCESS EVIDENCE
				@ PAPD			<input type="checkbox"/>

DESCRIPTION
OBTAINED CALL FROM (A) TO ME W/ PHONE NO. 415-440-4400

REPORT TYPE <input type="checkbox"/> SUPPLEMENTAL SEX CRIMES / MISC	PALO ALTO POLICE PROPERTY	CASE NUMBER 02-052-0232	<input checked="" type="checkbox"/> ORIGINAL <input type="checkbox"/> HEALTH HAZARD
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SOURCE CODE: "F" = FINDER "O" = OWNER "S" = SUSPECT "V" = VICTIM

SOURCE LAST, FIRST, MIDDLE (FIRM, IF BUSINESS)

<input type="checkbox"/> STATE OF CA S. WILKRAM, IN	O. PAPD
U. PC. 293	

PROPERTY CODES	D = DISPOSAL REQUEST S/R = STOLEN/RECOVERED E = EVIDENCE S = STOLEN F = FOUND R = RECOVERED K = SAFEKEEPING O = UNDER OBSERVATION	<input type="checkbox"/> SEARCH WARRANT <input type="checkbox"/> FINDER'S CLAIM <input type="checkbox"/> 5150 / 8102 W&I <input type="checkbox"/> D.V. / 12028.5	LOCATION CODES	L - # = LOCKER NUMBER F = FREEZER R = REFRIGERATOR V = VICTIM HOLD C = CAGE
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ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
#8	O	V	1	AUDIO TAPE	MAXELL		
SERIAL NUMBER		LOCATION COLLECTED			VALUE	LOC CODE	PROCESS EVIDENCE
		FROM (U) HOME					<input type="checkbox"/>

DESCRIPTION

TAPED CONVERSATION ABOUT PERSONAL MATTERS

ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
#9	E	O	1	AUDIO / USED TAPES	MAXELL		
SERIAL NUMBER		LOCATION COLLECTED			VALUE	LOC CODE	PROCESS EVIDENCE
		FROM PAPD ISD					<input type="checkbox"/>

DESCRIPTION

SUBJECT INTERVIEW

ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
SERIAL NUMBER		LOCATION COLLECTED			VALUE	LOC CODE	PROCESS EVIDENCE
							<input type="checkbox"/>

DESCRIPTION

ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
SERIAL NUMBER		LOCATION COLLECTED			VALUE	LOC CODE	PROCESS EVIDENCE
							<input type="checkbox"/>

DESCRIPTION

ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
SERIAL NUMBER		LOCATION COLLECTED			VALUE	LOC CODE	PROCESS EVIDENCE
							<input type="checkbox"/>

DESCRIPTION

ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
SERIAL NUMBER		LOCATION COLLECTED			VALUE	LOC CODE	PROCESS EVIDENCE
							<input type="checkbox"/>

DESCRIPTION

ITEM #	CODE	SOURCE	QTY	PROPERTY TYPE	BRAND/MAKE	MODEL	SHELF #
SERIAL NUMBER		LOCATION COLLECTED			VALUE	LOC CODE	PROCESS EVIDENCE
							<input type="checkbox"/>

DESCRIPTION

SEX CRIMES / MISC --

02-052-0232

SYNOPSIS

The 30-year old female victim is under the psychological care of the male suspect. The suspect places his penis inside the victim's vagina during a therapy session and has sexual intercourse with her. The suspect is at large and investigation is continuing.

INVESTIGATION

On 21 Feb 02 at about 1830 hours, I responded to the front desk of the police station on a report of a miscellaneous sex offense. Upon arrival, I met with the victim and her boyfriend of 11 years [REDACTED]. I escorted them to the conference room in the Investigative Services Division for an initial interview. The boyfriend accompanied the victim for moral support and was present for this initial interview.

Statement of Victim

The victim said she had hurt her arms at work recently with some sort of repetitive stress injury. She said she went to Stanford Hospital and was referred to see a psychologist at the Integrated Medicine Clinic. The psychologist is the suspect in this case.

The victim said that over the course of several weeks, her appointments with the suspect began to get longer and longer, and she began to tell the suspect personal details about her life and her history. The suspect told the victim that her arms hurt because she was "sexually repressed." The suspect additionally told the victim that she needed to "push the envelope" and "push against [her] fears."

On 06 Feb 02, the suspect took the victim to his apartment. The victim could not tell me where exactly the apartment was, but said it was only a few blocks from the police station and had a fountain in front. There is a similar apartment building at the corner of Gilman Street and Forest Avenue. Once inside the apartment, the suspect told the victim to take off her clothes piece by piece, which she did. The suspect then had sexual intercourse with the victim.

Afterwards, the suspect and the victim went to Denny's Restaurant in Palo Alto, at 4256 El Camino Real. They ate a meal together, and then they went to the suspect's other apartment in Mountain View, where they again had sexual intercourse.

The victim told me that she was confused as to whether the sexual intercourse was legitimate treatment for her injured arms or whether it was "abuse." She told me that she did not want the suspect to "get into trouble."

The victim said that she has recently seen another woman sitting in the suspect's waiting room at his office, and she felt afraid for that woman in case the suspect tried to have sexual intercourse with her as well.

At that point, Detective Powers came into the conference room. Detective Powers took the victim to the interview room to obtain a complete statement from her. I escorted the victim's

[Signature]

REPORT TYPE / CLASSIFICATION

(CIRCLE)

SEX CRIMES / C.B.C.

PALO ALTO POLICE
CONTINUATION

CASE NUMBER

02-052-0232

1 boyfriend outside the police station. I then went to the interview room and sat in on Detective
2 Powers' interview.

3
4 At the conclusion of the interview, Detective Powers instructed me to hold off on writing the
5 victim's initial statement until such time as she could confer with a deputy district attorney. On
6 today's date, I received a voicemail message from Detective Powers asking me to write the
7 details of the victim's initial statement.

8
9 Detective Powers told me she would handle all follow-up for this case.

10
11 Recommendation

12
13 Investigation continuing.

OFFICER'S NAME

PERRON

ID NUMBER

P0143

DATE

22 FEB 02

SUPERVISOR REVIEW



ID NUMBER

DATE

INVESTIGATION:

On 21 FEB 02 I copied a radio call that a female victim was in the PAPD lobby to report a sexual assault. I told the responding officer, Zach Perron that I would assist in interviewing the victim. After Ofc. Perron initially spoke with the victim I entered the conference room and asked that the interview be done in a room where it could be taped. The victim's statements were taped and the following is and a transcript has been included for the victim's statements.

The victim has asked for the protections provided under PC 293, and for the purposes for this report she will be referred to as "the victim."

Summary of Victim's & Suspect's Actions:**Summer 2000:**

Victim is working for Lucile Packard Children Hospital. Victim suffers industrial injury and is unable to work.

December 2000:

Victim sees Dr. Date for her industrial injury. Dr. Date determines victim suffers from a bi-lateral tendonitis with wrist and elbow soreness. Dr. Date prescribed water based physical therapy and biofeedback.

January 2001:

Victim starts seeing Dr. Ian Wickram at the Stanford Complementary Therapy Medicine Center for her first of numerous "therapy" sessions. Victim sees Dr. Wickram once a week for one hour.

February - May 2001:

Dr. Wickram tells the victim that she is sexually repressed, because she is Catholic, and tells her that she suffers from a dissociation disorder. Dr. Wickram told the victim that he needs to treat her whole person before he is able to treat her for the industrial injury. Once workers compensations Dr. Wickram tells the victim he needs to see her once a week for two hours at a session.

June - November 2001:

Dr. Wickram tells victim that he needs to "desensitize" her to physical touch and told the victim that she needed to remove her outer clothing. Victim usually wears a wool jacket to her appointments. Dr. Wickram told her to remove her jacket. The following appointment he had her remove her sweatshirt. The next

appointment Dr. Wickram rubbed the victim's arm and told her that he is desensitizing her to his presence.

During this time Dr. Wickram has the victim sechedule all of her appointments for the last possible appointment time, claiming he needs to work with her after hours.

December 2001:

Victim recalls that during office visits Dr. Wickram started what he called "touch therapy." Dr. Wickram had the victim sit in a chair with her legs spread apart, thus "exposing the sex organ" and allowing her to move past her sexual repression. On one occasion Dr. Wickram has the victim stand in a corner and he stood in her way making her feel trapped by his body, the wall and a desk. Dr. Wickram constantly told the victim that she needed to "push the envelope" with her therapy and allow him to be close to her. He starts to hug her and violate her personal space. The victim questions, to herself, his actions but is convinced by his words that this is treatment for her arms. Victim allows him to continue treatment.

Dr. Wickram continued to work on "desensitizing" victim and told her that they need to meet outside the office to get her used to the idea that he is her therapist and a real person too. Dr. Wickram told the victim that she needed to not just dump her life on him and leave, that they need to see each other outside the office setting to start her on her path to recovery. Dr. Wickram and the victim have their first session outside the office and meet at The Prolific Oven in Palo Alto.

Sometime in either late November or early December Dr. Wickram met the victim at Prolific Oven for therapy and to discuss her test results. After sharing a coco Dr. Wickram asked the victim out to his car to show her the manuscript to his book. The victim told Dr. Wickram that she would like to go back into the Prolific Oven to review it. He insisted that they go to his apartment to review the papers. Victim recalled walking to his apartment at Forest and Gilman going into the building that had a wooden door and a fountain out front. They went into apartment #3 and she sat in a brown chair and reviewed the manuscript. Victim said she was extremely stressed during this visit and cannot recall if anything unusual occurred.

During this month Dr. Wickram told the victim to by a book, "You and Yourself", authored by Lonnie Barback. The victim was supposed to read this book on masturbation, highlight the things she agreed and disagreed with, and then she and Dr. Wickram were to work on the book. The victim did not do as Dr. Wickram asked and he told her she was, "non-compleint" and "not cooperating with her treatment."

January 2002:

Victim has specific dates listed for the month and has provided information on all of the appointment dates scheduled with Dr. Wickram

3rd Victim made an appointment to meet Dr. Wickram in his office. He called and canceled the appointment.

8th Victim canceled appointment because it is her birthday.

9th Victim made an appointment for 7pm at the office. She met Dr. Wickram at the office and he told her to follow him to his apartment for their appointment. Victim noticed/ a pattern where Dr. Wickram progresses one step further from the last appointment; she recalled Dr. Wickram told her take off her clothing. The victim is uncomfortable and refuses. Dr. Wickram told her that she is not willing to do what it takes to get better, and told her that she needs to push the envelope of her treatment in order to get better. Victim complies and removes portion of her clothing. Victim knows Dr. Wickram touched her body but is cannot recall where. The appointment ends at 0100.

15th Victim has an office appointment scheduled for 5pm but recalled leaving at 11pm. Victim cannot recall anything that may have happened during that appointment.

16th Victim scheduled an appointment for 7pm to 9pm knowing that it will be outside the office. She met Dr. Wickram at his office and he lead her to his apartment in Palo Alto. Victim is led in the apartment and into the bedroom where there is a futon laid out on the floor in a bed type position. Dr. Wickram told the victim to sit on the bed. She does and he sits on the bed next to her. Dr. Wickram told the victim to hug him and she complies. Dr. Wickram told the victim to lie on the bed and he layed on top of her and rubbed his pelvis against her pubic area. Dr. Wickram and the victim sit up and he told her to remove her shirt. She does and he told her that she is to rub his back and it would give her pleasure and that he would rub her back and it would give him pleasure. *(The victim complies with these requests because Dr. Wickram has told her that because of her sexual repression she cannot have positive feelings in her body. These actions are to teach her to feel those positive feelings)* Dr. Wickram attempted to touch the victim's naked breasts, she instinctively blocks his attempt with her arm. The victim told Dr. Wickram that she felt violated and he replied by laughing and telling her that she justified her movement in her mind, but that she is not complying with the therapy. Dr. Wickram told the victim that he is using an unorthodox method to help treat her and that if it was not therapy he would not

be doing it. Dr. Wickram then tried to touch the victim's vagina (outside her clothing) and again she pushed his hand away after he touched her. Again she felt violated. Dr. Wickram told her that she did not want to get better and that the arm pain would continue unless she allowed him to treat all of her and not just her arms.

20th Wickram convinced victim to attend a seminar in Santa Rosa for Saybrook. The seminar is at the Hilton and victim had friend Mike Castro drive her to the seminar. Wickram attempted to present the victim to the audience as an example for biofeedback treatment. Victim refused and later leaves seminar. Wickram told the victim that he is upset because she did not drive herself and is unable to go to dinner with him.

23rd Victim has went to a scheduled appointment at 5pm at the clinic. She is there until 7pm and then is led to the Wickram's apartment. Again she and Wickram lie on the bed together and move one step past their previous meeting. Victim is not sure what happened that evening but knows she left the apartment at approximately 9pm.

28th Victim goes to clinic at 6pm for a scheduled appointment. Sometime after 7pm Wickram lead the victim to his apartment and once again they start the therapy session on the bed. Wickram had the victim remove her shirt and bra and then he "kissed the top of both my nipples." The victim was upset and confused as to how that could be therapy but Wickram told her that she has no positive feelings in her body, and he must do that to give her positive feelings in her body.

29th Victim had a previously scheduled office victim from 5pm – 7pm. The victim felt scared and ashamed and canceled the appointment. Victim was at home and approximately 2030 hours received a call from Wickram on her cellular phone. Wickram told her to face her fears and come meet him at his apartment in Palo Alto. When she met Wickram she told him she was upset and hurt because he kissed her breasts the night before. Wickram told her he was angry with her because he too is Catholic and spent a lifetime getting over his sexual repression and now she brought those feeling back to him. The victim left the appointment with Wickram angry with her.

During the month of January the therapy sessions progressed in a physical manner. One appointment would start with sitting on a chair. Then sitting on the same chair with him hugging her from behind. Then sitting on the chair with them straddling each other "to expose their sex organs to one another." (Clothing on.)

The appointments turned more physical and are documented above. To convince the victim to comply Wickram continually told her that she was sexually repressed, and that she had low self esteem, and that this unorthodox therapy would be

During the month of January Dr. Wickram started role-playing with the victim and played the part of her father. Dr. Wickram learned through the therapy that the victim's father attempted to kiss her in an inappropriate manner when she was a teenager. The victim adamantly told Wickram that her father never molested her. Wickram did not believe her and during one session in January hugged and kissed her as if he was a father molesting his child.

February 2002:

Victim has specific dates listed for the month and has provided information on all of the appointment dates scheduled with Dr. Wickram

1st Victim had a phone conversation with Wickram. He convinced her to meet him the following day by telling her that she is in a crisis.

2nd Victim met Wickram at his apartment. The victim noted that he is moving and almost all of the furniture is out of the home. There is a blue blanket on the floor and he asked her to lay on it with him. Wickram told victim that the workers comp company is going to take away her treatment. Victim and Wickram lay on the blanket and he hugs her and offers to treat her for free at his home in Tracy.

4th Wickram calls victim to see if she is OK after learning that her treatment is about to be stopped by the workers comp company. Wickram asked victim to meet him at his apartment for a free therapy session and to talk about future treatment. Victim agrees and arrives at his apartment at approximately 7pm. Wickram again leads her to the blanket on the floor kisses her and directs her to masturbate him, again said that she needs to have positive feelings in her body. Wickram then masturbates her. The victim left the apartment and was upset at what just happened she drove to Hayward and stayed the night in a hotel so she would not have to go home and so that she would be close to school for the following day. Wickram called the victim late that night to assure that she was "OK."

6th & 7th The victim met Wickram at the office at approximately 5pm from there the victim followed Wickram to his apartment in Palo Alto. As she entered the apartment she noticed a blue blanket on the floor. Wickram took his and her jackets, rolled them up into a ball and placed them at the head of the blanket as if they were pillows. Wickram hugged the victim and the next thing she remembered is that they had their clothing off and they were lying on the floor. The victim told the suspect that she felt uncomfortable and Wickram told that if she wanted her arms to feel better she had to push the envelope with her treatment. The victim said she was confused on what to do but trusted that this was treatment. She believed Wickram when he told her that if she followed through with the sex acts she would get better. The victim said they then mutually masturbated one another. The victim said Wickram placed his fingers in her vagina and told her that she needed to have positive feelings in her body. Later

masturbated one another. The victim said Wickram placed his fingers in her vagina and told her that she needed to have positive feelings in her body. Later he told her that they were soul mates and then placed his penis on her vagina. During this time Wickram told the victim that he was her friend, her doctor, and her lover. Wickram then ejaculated on her and she got up from the floor and "wiped" her self off.

The victim and Wickram said they went to Denny's and he had dinner. The victim said she felt disoriented and sick and was unable to eat. While at Denny's Wickram convinced the victim to go to his new apartment in Mt View to see if his wife had called.

The victim followed him to the apartment. She initially sat in the car and invited her into the apartment. The victim recalled seeing a futon, leopard chairs, a white answering machine, white fridgerator, white cabinets and a couch. The victim said she felt dissociated and numb while she was there. The next thing the victim recalls is sitting on the couch with her shoes off. She then recalled being in the bed naked and a red light was on. She said they mutually masturbated one another and then they had intercourse. The victim said Wickram ejaculated on her and again she got up, cleaned her self off and then left. The victim said she left the apartment and noted it was 0330 hours.

The victim believed that the sex acts were a form of bio-feedback therapy. Wickram convinced her that she was sexually repressed because she is Catholic. He then told her that she had NO positive feelings in her body and convinced her that the sex acts would help desensitize her and give her positive feelings so that eventually her arm pain (her original diagnosis) would go away.

After Wickram started sexually engaging the victim he told her to not have sex with her boyfriend Marc. He told her that this therapy was a secret and no one would understand the treatment. He told her that if she told Marc about the therapy that he too would start having arm pain. He told her that if she told her friend Mike Castro about her treatment, Castro would turn against her and probably attack her.

During the interview it was clear the victim was upset scared and confused. At the time of the first interview she was convinced that Wickram was trying to help her and she was sure that the sex acts were a form of therapy that would eventually cure her wrist pain.

The victim told me that she would be willing to participate in a pretext call but did not think that she would be able to make the call from PAPD. I gave the victim a recording device that she could attach to her home phone and some blank audio-tapes. I gave the victim a Victim / Witness card and ended the interview.

Recommendation:

INVESTIGATION:

On 25 FEB 02 I met with the victim for a follow-up interview. After the interview was complete I gave her a device to record all of her incoming and out going calls to Wickram. I discussed the idea of a pretext call and the victim was not willing to make the call at PAPD. She wished to go home and think about it for a day and then make a decision. During the week the victim contacted Wickram from her home and recorded their conversations. The following is a summary of those conversations.

Tuesday 26 FEB 02:

Call #1 – Victim called Wickram and left a message.

Call #2 – Victim called Wickram and the following things were discussed in their conversation

V. confronted suspect about why he had her come to his apartment, and why he made her do things that she did not want to do. She questioned him about why he wanted her to "push the envelope" with her treatment. Wickram responded by only saying that he would like to talk in private, and the phone is too public. V. continued to push the issue with Wickram and he ignored her and continually told her to come to his home in Tracy so they may talk about her questions. V. questioned why he did not treat her for her industrial injury and why he pushed her to treat her for his diagnosis that she was sexually repressed, and suffering from other disorders she never had before. Wickram told her that her arm pain was connected to her reactions to fear and anger, and that the mind body connection in these areas prevented her from getting better.

Victim – "I want to know why we had to go to the apartment, take off my coat, take off my shirt, take off my bra." "Didn't you think that, that would confuse me more?" "I mean I understand your desensitizing stuff, I understand that, didn't you that, that would confuse me more Dr. Wickram?"

Wickram – "Tammy, the flooding, the role playing was because of the previous psychiatric history you had."

Victim – "I have no previous psychiatric history." "I have no previous psychiatric history."

Wickram – "Alright I know that but you told me about, that woman holding you by the legs."

Victim – "Dr. Wickram that has nothing to do with my arm pain." Normal people go through and get their bio-feedback and they get their whatever they get better and they move on with their life." "Why did we have to focus on my life instead of my arm pain?" "Why?"

Wickram - Because (inaudible)

Victim - "Then why did I have to take off my clothes?" Why?"

Wickram - "(victim's name)"

Victim - "Why?" "Why did I have to touch you and you touch me?" "Why Dr. Wickram?"

Wickram - "What are you talking about on the phone (victim's name)?"

Victim - "I'm confused Dr. Wickram, you don't understand." "This has been bothering me for a while."

Wickram - "Right"

Victim - "And I've been shutting up and doing what you want me to do." "And now I have to stand up to you and I need you to answer me." "I mean don't you remember the time after that my shirt came off and you kissed my breasts"

Wickram - "What?"

Victim - "The time that I was in your apartment." "And I left here"

Wickram - "(victim's name)"

Victim - "Remember I was, I was in your apartment Dr. Wickram."

Wickram - "We cannot talk over the phone about what you are saying, I don't know what you're talking about."

Victim - "What do you mean you don't know what I'm talking about?"

Wickram - "I need to talk to you in person about this." "Please."

Victim - "How come, are you telling me you don't remember this now?"

Wickram - "(victim's name) I need to talk to you in person, would you please do that."

Victim - "Dr. Wickram why are you doing this to me?" "I remember that night, it was the same, the same (crying). Don't you remember I was in your apartment I was in the office crying because I was upset because the day before was the shirt thing, and you kissed my breasts and you gave me a hicky on my neck." "And I was upset, and you kept hitting you chest saying those Latin words." "Don't you remember?" (crying) "Could you answer me?"

Wickram – "Can I please talk to you in person (victim's name)?" "About this."

Victim – crying

Wickram – "Can you come tomorrow?"

Victim - "No, I would need to talk to about this first, Dr. Wickram." "It's all of this stuff that I'm confused about, don't you understand?" "It's all of this stuff that I'm confused about, why, why did we have to go down this road?"

Wickram – inaudible

Victim – "I can't hear you."

Wickram – "The flooding and the desensitization."

Victim – "The flooding in the apartment?"

Wickram – "The flooding and the desensitization is confusing to you I know that."

Victim – "Well I want to know why we had to do that?"

Wickram – "Yeah"

Victim – "Why did I have to take my shirt off in the apartment?" "I mean you confused me." "I mean in one breath (interrupted)"

Wickram – "I understand."

Victim – " (continued) you say that not only am I your doctor, I am your friend, your lover, I'm your teacher and your mentor." Remember you said that to me." "You said that you'd be honest with me."

Wickram – "Yes I will but I need to speak to you in person (victim's name)." "I'm sure you can understand that."

Victim – "Why do I have to see you in person and talk about this stuff?" "Why?" "Are you mad at me?" "That was my other question, are you still mad at me for being up set about you kissing my breast?"

Wickram – silence "I need to speak to you in person."

Victim – "Can you tell me why?" "Can you tell me why you can't talk to me know?"

Wickram – "Can't talk to you about confidential matters on the telephone."

Victim – "I can't hear you."

Wickram – "I can't talk to you about confidential matters on the phone."

Victim – "We always talked on the phone Dr. Wickram, I mean we talked every day about confidential stuff." "What is wrong with talking now?"

Wickram – "I need to talk to you in person like you said." "My wife is at the door (victim's name)"

Victim – "What?"

Wickram – "My wife is at the door, I got to open the door, hey can you call me as to when we can meet at that coffee shop to talk."

Victim – "I wanted to talk to you about this before I saw you."

Wickram – "I can't talk to you about this stuff on the phone, please OK, please try to understand."

Victim – "Alright I'll let you go."

Wickram – "I'll talk to you later."

Victim – "Bye."

End of call.

Statement of Victim:

I called the victim and asked her what she believed Wickram meant when he said "Flooding" and "Desensitization. The victim told me those terms were words Wickram used during her therapy sessions. She believes flood and desensitization are words that work together. In that he would attempt to flood her or put her in a position of sensory overload in an attempt to desensitize her to those things he said bothered her.

Recommendation:

Investigation continuing

INVESTIGATION:

On 25 FEB 02 I met with the victim for a follow-up interview. After the interview was complete I gave her a device to record all of her incoming and out going calls to Wickram. I discussed the idea of a pretext call and the victim was not willing to make the call at PAPD. She wished to go home and think about it for a day and then make a decision. During the week the victim contacted Wickram from her home and recorded their conversations. The following is a summary of those conversations.

WEDNESDAY 27 FEB 02:

The victim made several calls to Wickram an attempt to verify his claim that he was having chest pains and needed to go to the hospital. (Referencing a voice mail Wickram left at 0030 hours that morning.) The victim never made contact with the suspect this day.

Recommendation:

Investigation continuing.

INVESTIGATION:

On 05 March 02 I received a call from the victim, who made the following statements.

Statement of Victim:

The victim told me that she received two voice mail messages on her cellular phone from Wickram. She saved those messages and played them for me while I recorded them.

Call #1 (Wickram) Received at 1015am – "I (victim's name) this is Dr. Wickram. I can go back to work next week so let me know when to schedule the biofeedback like you said. You can come for free, no charge, or for \$10.00 an hour you if you want to pay for it. You now have my address and if you have difficulty finding give me a call. I will be transferring several Stanford patients to Tracy for my health reasons. I can't drive there, but I will still keep my teaching and research at Stanford. **I'm sorry about the flooding and desensitization I took a huge risk. I will regret this till the day I die. I'm really sorry. I don't think it speeded up the therapy.** It nearly killed me when I went to the ER. I wondered if you have a chance, if you had a chance to get a Stanford federal catalogue. You know I have prayed for you daily even though, I've not seen you in several weeks. I prayed for you daily. Call me when you want to finish your biofeedback in Tracy, OK. And I hope your keeping up your increasing activity, both in the pool and outside the pool. Let me know so you can start next week, I've been released to go back to work, OK. Bye bye.

Call #2 (Wickram) Received at 1117am – "Hi (victim's name) I though the first time you come to Tracy you can have someone drive you, and if you need more directions just call me. Alright, see you, bye bye.

The victim did not have any phone conversations with Wickram. Nor did she attempt to call him.

Recommendation:

Investigation continuing.

INVESTIGATION:

On 26 MAR 02 I called Wickram at his office in Palo Alto and asked him to come to PAPD for an interview. Wickram told me he would be at PAPD at 0900 and asked for directions.

At 0910 Wickram arrived. I escorted him to the ISD interview room and explained to him that he was not under arrest and that he was free to leave at any time. The interview was recorded and the following is a summary of that interview.

Statement of Suspect, Dr. Ian Wickram:

I told Wickram that one of his clients made a complaint about him and asked him to tell me about his work history. Wickram told me he was a PhD in Counseling Psychology, and that he works for Stanford Medical Center in the Complementary Medicine Center. I confirmed that he works with Biofeedback and asked him to describe treating someone by using Biofeedback.

Wickram described Biofeedback as a system that monitors changes via the autonomic nervous system, and other biological systems. Wickram monitors primarily via the autonomic nervous system and does this by placing electrodes on the fingers and the back. He then will talk to the client about a traumatic situation and simultaneously monitor their biological reactions. Wickram will then practice different calming techniques with the client in an attempt to get a different body response to those situations. Wickram added that most of his clients have been checked by a medical doctor, and have no physical cause for their condition. Wickram believes that a stress or a trauma has happened in the client's life which has settled in part of the body resulting in pain. Wickram said it is his job to seek out the issues that may be causing the client's pain, have the client refocus that energy into dealing with the underlying cause, thus curing the client.

Wickram told me that he sometimes works out of his home in Tracy, and has seen a few clients there. Wickram explained that some of those patients live in Tracy and some are from out of State. Wickram told me that he treats two of his Stanford Clients at his home and that both of those are men who live in Stockton and Fremont.

Wickram ^{told} me that he had an apartment in Palo Alto on Forest Avenue and that he currently has an apartment in Mt. View. Wickram said he could not remember the address to either apartment but described the apartment as being off Del Medio near the car wash and Swagat Restaurant. Wickram said he stays in apartment #235. Wickram said he has treated only one patient at his apartment in Palo Alto, and that he has treated her about four or five times. He saw the patient there because she was from New York and it was more convenient to see

her there. Wickram said he has stand-alone Biofeedback equipment that is mobile. Wickram denied seeing any other patients at his apartment in Palo Alto or Mt. View.

I asked Wickram to tell me what he knew about the victim. Wickram told me he had been seeing the victim over a year for hand and arm pain. Wickram said the victim called him one time after the QME told her treatment would be terminated. He said this call happened over a weekend that she came to the apartment once and that he briefly spoke to her there. He said all of her other treatment happened at the clinic on Stanford Campus. When this happened Wickram said he was in the process of moving out of his apartment and into his new apartment in Mt. View. I asked Wickram if the victim had been to his apartment in Mt. View, he replied, "No." I then asked him again and he took a few moments before he said maybe she was there once but that he really could not remember. Wickram said he did not do any Biofeedback there and that all took place in the Clinic at Stanford. Wickram estimated that he only spent 45 minutes with the victim in his apartment and mentioned that his wife was present when this happened.

Wickram characterized his relationship with the victim as doctor / patient only, and said all of his interaction with her for treatment purposes only. Wickram said he has the victim's cell phone number and admitted making numerous calls to the victim, all "because she was upset." I explained some of the techniques used by investigators to look into alleged crimes. I told Wickram that the victim alleged she was the victim of sexual abuse at his doing. Wickram initially denied having any physical sexual interaction with the victim. He told me that he asked the victim to buy a book called "For Yourself." The book is on women's sexuality and discusses masturbation. Wickram told the victim to read the book and to practice masturbation. Wickram said the victim did not do as he said and he admitted telling the victim that she was not willing to move forward with her treatment if she was not willing to masturbate. Later in the interview Wickram admitted telling the victim was she was "not complying" with her treatment because she refused to masturbate. He told her that if she wanted to get better that she "should" masturbate.

I asked Wickram to explain, "flooding" and "desensitization" Wickram told me he had to push the victim to talk about her father. Wickram changed the subject and explained that the victim did go to his apartment and had her sit in the chair, but denied any physical or sexual interaction between he and the victim. I told Wickram that I did not believe him and reminded him that I had his admissions on tape. Wickram than admitted that he often hugged the victim, and that he did role-play interactions with her. I asked him to tell me about those role-play interactions. He told me that she described what he father did to her, but said that they only role-played a situation where her father pushed and shook her. Wickram said he played the victim and she played her father. Wickram would not elaborate on any other role-play situations.

I asked Wickram why he would have the victim sit in a chair, fully clothed, with her legs spread apart to "expose her sex organ." Wickram paused for a minute and told me he did not recall that situation.

I asked him about the time where the victim met the suspect at the Prolific Oven and he showed her the manuscript from his book. Wickram said the victim was anxious about meting with the QME and he wanted to allay her fears about any possible results. He asked her to meet at the coffee shop and they talked about the QME. Later in the evening he showed her his manuscript and asked her to his apartment. They walked a couple block and went into his apartment. Wickram would not say what happened in the apartment, but said the victim was there for 30 - 45 minutes.

I asked Wickram how he tied her arm pain to her lack of masturbation or sexual repression. Wickram explained that the victim had a troubled relationship with her boyfriend and that they had not been physical with each other in over a year.

I asked Wickram how many times the victim had been to his apartment. Wickram started by telling me once, and then admitted that she had been there at least two or three times. I asked why there was a discrepancy from what he said before and he told me his memory was jogged when I asked him about his manuscript.

Wickram told me that he has not charged Tammy for the appointments that he had with her in his apartment, although he was treating her and attempting to help her through a crisis.

I asked Wickram how many times he had sexual intercourse with the victim. Wickram denied having sex with the victim, but told me he cared for her deeply. Again I asked Wickram how many times he had sex with the victim. Wickram responded by telling me that the victim had feelings for him. I told Wickram that maybe he had feeling for her separate from his professional relationship. After several minutes Wickram told me he would not have taken her to his apartment if he had not cared about her. Wickram again said there was no physical relationship but said that they role-played at the apartment. Wickram told me he role-played a situation where the victim's father kissed her. They also role-played a situation where the victim's father took her to a motel. Wickram said that was not sexual interaction but that it was role-playing. Wickram said flooding is not about sex it's about role-playing.

I confronted Wickram about his lack of honesty. I asked Wickram if there were other potential victims, and told him that I would have to look for other victim's. Wickram told me that there was no one else. Wickram told me that he "deeply cared" for the victim and that he was willing to help her in any way he could.

I asked Wickram if he developed feelings for the victim, which may have led to him having a sexual interaction with the victim. Wickram admitted to having sexual intercourse with the victim. He told me that his typical course of treatment was not working and that he had to try something else. He started by having her buy the book on masturbation, but she refused to do what the readings suggested. Frustrated because she was not doing as he suggested and because she still suffered from arm pain he moved to role-playing. Nothing was working and Wickram said he should have just given up but he knew how much she had been through and that he grew to have feelings for her. When she learned that the QME was going to terminate her treatment she became very upset. Wickram said that was the time he saw her over the weekend. Wickram said, "By inviting her over to my apartment, that was a huge risk I took, that was a huge risk. " "The biggest professional risk I took in my life." I told Wickram that he cared for the victim, and he replied, "That is why I took that risk." "And I told he that at the time." "So inviting her to go there was a huge personal risk. And I could not take her to the clinic because the clinic was closed." Wickram went on to tell me that he cared for the victim and for her future. He said, "If I had not cared I would not have taken this professional risk."

Wickram paused then told me, "There was no abuse involved, I cared about her deeply. And I believed she cared about me." He reiterated that invited the victim to his home and acknowledged that they had sexual intercourse. Wickram the said, "What ever happened, happened out of love and care, the risks I took were out of love and care." I told Wickram that the victim was concerned that she may have gotten a sexually transmitted disease, especially since he did not use a condom. Wickram responded by telling me that he had not been with anyone else but his wife and that he did not have any sexually transmittable diseases. Wickram again confirmed that he had not been with anyone sexually but for the victim and his wife.

I asked Wickram how many times they has sexual relations. Wickram would not comment but to be he was upset by the situation. Wickram told me he had chest pains because he became so upset about the situation. Wickram told me he initially did not recall them having sex in his apartment in Mt View, but now he recalled that incident. Wickram told me he wanted to talk to her about the situation. He reiterated that he was sorry for the flooding and desensitization and that it pushed her over the edge. Wickram said, "If this thing with the QME had not occurred I would not have taken her to my apartment. Had she not gotten that upset, I would not have taken her to my apartment. And taken that huge personal risk I did. "

Wickram told me he loved and cared about the victim. Wickram told me he told the victim that he was sorry. He again reiterated he was sorry and took a huge professional risk.

I left the interview room for a few moments to get some water for Wickram. When I returned Wickram told me that he cared for the victim and her future. Wickram told me that he wanted to continue to treat the victim, I told him that it probably was not a good idea that he treat her and he agreed. Wickram told me would like to talk to the victim and resolve this. Wickram again told me he took a huge personal risk, but then said he was getting so frustrated that she was not getting better. He commented that he should have just given up like other therapists. He commented that he began to care for her and continued to treat her anyway. He told me he cared about her deeply, "like a father." And told me, according to the victim, that occasionally he called her "Judy" his wife's name. Wickram did not recall calling her Judy, but believed it probably happened.

Wickram asked me to have the victim meet him at the Prolific Oven, so he could talk to her. He asked me to tell the victim that he cares deeply for her and that it doesn't really matter what happen, but hat he did not want his wife to find out. Wickram told me that he has been married for 13 years and that nothing like this has happened before. I ended the interview by telling Wickram to not call or have any contact with the victim. He agreed and the interview ended.

Criminal History:

Wickram has no criminal history in the system.

Recommendation:

DDA Brown review for prosecution.

EXHIBIT F

FILED UNDER SEAL

Exhibit F

EXHIBIT G

FILED UNDER SEAL

EXHIBIT G

EXHIBIT H

1 PALO ALTO FACILITY
270 GRANT AVENUE
PALO ALTO, CA 94306

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA
PROCEEDINGS SENTENCE, PROBATION ORDER

CASE NO. BB256996
CEN 02507927
DATE 08/30/2002 10:00 AM
09/23/1938 CAB6413P12
DEPT. 84
DSE421 M

PEOPLE VS. IAN WICKRAM
J.A. 2041 SUPERIOR COURT
TRACY, CA 94304

JUDGE HON. DOUGLAS K. SOUTHARD

REPORTER VIVIAN BALBONI

DEF. ATTY. CASENAVE, JOHN

CHARGES F(001)BP729(A)

STATE DOJ - ATTY GEN. L. MORCER
FOR BD OR PSYCHOLOGY

HEARING PLEA

AGENCY PA-04312-PO095-POWERS

STATUS O-WP

CLERK: DIANE CLARK

F(002)BP729(A)

TW Y

VIOLATION DATE
02/06/2002

EXT COURT APPEARANCE DATE

Defendant Present ☐ Not Present

Arr./Advised ☐ Viol. Of Prob. ☒ Arr. Waived

Not Guilty ☐ Repr. Advised/Waived

COP ☐ Guilty ☒ Nolo Contendere ☐ Refusal Adm.

Priors ☐ Allegations ☐ Admitted ☐ Denied ☐ Stricken

Time Waived ☐ Not Waived ☒ For Sentence

Refer ☐ Appoint Alternate Defender ☐ Legal Aid

Alternate/P.D. Declares conflict ☐ Relieved

Stip. To Comm. ☐ PC977 waiver filed

Factual Basis ☒ Findings ☒ Adv. Max. Penalties

Waives rights 4215 - PRELIM

Amended to VC23103(a) ☐ purs. VC23103.5 MDA

D.A. statement filed ☒ Dismissed MDA VOTC 2

Amended MDA - CTI - ADD NAME HEATHER DOE

PC17b Reduction CERTIFIED TO 43100

Sentenced to County Jail ☐ Execution ☐ Imposition of sentence suspended for the probationary period.

COURT ☐ FORMAL PROBATION GRANTED for a period of days/mos./years from the date of this order.

Probation ☐ Reinstated ☐ Terminated ☐ Modified ☐ Revoked. Court finds Violation/No Violation Prob. ☐ Probation extended to expire

Original Terms in full force except as amended herein

Probation may be modified to ☐ Upon completion of

Conditions of Probation follow (see reverse side for additional conditions) ☐ PC1203.1B fees ordered/waived \$ + \$ /mo.

LINE	PAY TO:	COURT	D.O.R.	PROBATION	FAMILY SUPPORT TRUSTEE \$
unt	\$	PA	Orig. Fine Bal.	\$	<input type="checkbox"/> Sentence Suspended
unt	\$	PA	CTS PC 2900.5	\$	<input type="checkbox"/> Refer VWAC Restitution Report
unt	\$	PA	Total Amt Due	\$	<input type="checkbox"/> Restitution \$ thru <input type="checkbox"/> VWAC <input type="checkbox"/> APO
DRF/RF \$ <input type="checkbox"/> Hours of Volunteer Work in lieu of fine <input type="checkbox"/> PC987.8 Fees Ordered \$					
APA/DPF \$ <input type="checkbox"/> Payments granted/modified \$ per month commencing					
LAB \$ <input type="checkbox"/> Stay to <input type="checkbox"/> To Pay Today <input type="checkbox"/> Fees to be collected civilly					
NC \$ <input type="checkbox"/> Committed for fine at one day in jail for each \$ of unpaid fine (May Pay Out)					
AR \$ <input type="checkbox"/> Consecutively <input type="checkbox"/> Concurrently to <input type="checkbox"/> Deemed satisfied					
CJAF \$ to <input type="checkbox"/> Domestic Violence Fee \$ <input type="checkbox"/> Shelter Fee \$					

AIL ☐ Straight Time ☐ Weekday ☐ Weekend Work ☐ PC1209 Fee Ordered ☐ PC1209 Fee Waived ☐ Work Furlough Recommended

Serve Hrs./Days/Mos. ☐ Suspend ☐ All But Hrs./Days/Mos. ☐ EMP ☐ No Early Release Programs

PC2900.5 credit Hrs./Days. To be served consecutively/concurrently

On Condition Participate in Licensed Residential Treatment ☐ Appear Dept. of Correction on AM/PM for Pre-Processing

Sentence to commence at 8:00 AM and consecutive MO/TU/WE/TH/FR/SA/SU

Stay of Execution granted to and defendant to surrender to Dept of Correction/Court at that time.

Must hold valid operators license and maintain Liability/Property Damage Insurance. ☐ Advised VC23206 ☐ HTO status ☐ Possess no weapons

Within days enroll in First Offender Alcohol Program and complete without interruption. ☐ Weapon ordered destroyed/returned

Participate in ☐ Delete ☐ Reinstated ☐ Re-refer First/Multiple Offender Alcohol Program as directed by Probation Officer (PO)/Court

Participate in Educational, Vocational, Alcohol, Psychiatric, Domestic Violence or other Therapeutic Program as directed by PO/Court

Submit person/vehicle/residence to search/seizure at any time without benefit of warrant. ☐ Alcohol/Drug Test as ordered by Peace Officer.

License suspended/restricted/revoked for to, from, during ☐ Work/Alcohol Program/School/App'ts. ☐ License surrendered ☐ Purs. VC13202.5/13202.6

License restriction removed ☐ Adv VC23246 ☐ I.I.D. Not/Ordered installed/removed. Term yrs. ☐ To sell/transfer vehicle and notify APO within days.

Vehicle ☐ Impounded ☐ Not Impounded ☐ Order Filed ☐ Hours Volunteer Work ☐ As directed by PO/S.A.P. ☐ Register purs. PC290/HS11590

Other

REMANDED to custody until next appearance. ☐ Increased ☐ Reduced

ORDERED RELEASED: ☐ on O/R ☐ on S/O/R BAIL \$ ☐ As a condition of SORP

COMMITTED to custody until sentence is satisfied in full. ☐ Stay on jail sentence. See above.

Verify the foregoing is a true copy of the order/judgment rendered on the above date.

ARK OF THE ABOVE ENTITLED COURT BY **DEPUTY CLERK**

ADVISE TO APPEAR: I will appear at all times and places as ordered by the Court, and have read and understand all conditions set forth on the reverse side.

EXHIBIT I



MEDICAL BOARD OF CALIFORNIA

ENFORCEMENT PROGRAM
 SAN JOSE DISTRICT OFFICE
 1735 TECHNOLOGY DRIVE, SUITE 800
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**CERTIFICATION OF COSTS
 OF INVESTIGATION AND ENFORCEMENT
 PURSUANT TO BUSINESS AND PROFESSIONS CODE SECTION 125.3**

In the Matter of the Accusation Against:

Ian E Wickram, Ph.D.

Professional License/Certification Number: **PSY 15096**

Accusation Number: **W240**

Medical Board of California Case Number: **1F 2002 132827**

DECLARATION

I, ANDREW C. HEGELEIN, am the Supervising Investigator for the San Jose District Office of the Medical Board of California, and in that capacity I have been designated as the representative to certify the costs incurred by the agency in the investigation and enforcement of the above described disciplinary action.

I have reviewed the pertinent records of the Board and certify that the following costs were approved for investigation and enforcement services rendered in this case, up to the date of the administrative hearing:

Medical Board of California Investigative Services:

Time and other expenses for the investigation of allegations against respondent which include, but are not limited to, conducting witness interviews, procuring evidence and medical records, travel, and report writing; time and other expenses for supplemental tasks related to the investigation and prosecution of this case:

<u>Year</u>	<u>No. of Hours</u>	<u>Hourly Rate*</u>	<u>Total Charges</u>
July 1, 2001 - June 30, 2002	16.50	\$88.73	\$1,464.00
July 1, 2002 - June 30, 2003	34.00	\$88.61	<u>\$3,012.74</u>
			\$4,476.74

Of the costs shown above, approximately .50 hours were spent on conducting interviews; 12.75 hours spent on records review; 5.50 hours spent on travel; 27.25 hours spent on report, memo and letter writing. The balance of time (4.50 hours) was spent on field work, meetings and telephone calls.

Miscellaneous Expense Items: [e.g., copying and subpoena service]

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*Hourly rates are computed in accordance with Section(s) 8740, 8752.1 and 8758 of the State Administrative Manual.

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Expert Reviewer Services:

Time and other expenses billed to the Medical Board of California by experts for reviewing and evaluating case-related materials, report writing, hearing preparation and examinations:

<u>Service</u>	<u>Date(s)</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
				-0-

MEDICAL BOARD OF CALIFORNIA TOTAL COSTS: \$ 4,476.74

CERTIFICATION

I certify pursuant to the provisions of Business and Professions Code Section 125.3 that to the best of my knowledge the foregoing certification of costs incurred by the Medical Board of California is true and correct and the amounts set forth do not exceed the actual and reasonable costs of investigation and enforcement of Accusation Number W240 (case #1F 2002 132827), and that these costs fall within the range of costs this Board has incurred in other license disciplinary actions of a similar nature.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th day of November, 2002, at San Jose, California.

 San Jose
Supervising Investigator District or ~~Probation~~ Office

Note: Attorney fees and other legal fees will be certified by the Office of the Attorney General.

EXHIBIT J

BILL LOCKYER, Attorney General
of the State of California
LAWRENCE A. MERCER, State Bar No. 111898
Deputy Attorney General
California Department of Justice
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 703-5539
Facsimile: (415) 703-5480

Attorneys for Complainant

**BEFORE THE
BOARD OF PSYCHOLOGY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

IAN E. WICKRAM, PH.D.

Respondent.

Case No. W240

OAH No.

**CERTIFICATION OF COSTS:
DECLARATION OF
LAWRENCE A. MERCER**

[Bus. & Prof. Code, §125.3]

I, LAWRENCE A. MERCER, hereby declare and certify as follows:

1. I am a Deputy Attorney General employed by the California Department of Justice (DOJ), Office of the Attorney General (Office). I am assigned to the Health Quality Enforcement Section in the Civil Division of the Office. I have been designated as the representative to certify the costs of prosecution by DOJ and incurred by the Board of Psychology in this case. I make this certification in my official capacity and as an officer of the court.

2. I represent the Complainant, Thomas S. O'Connor, Executive Officer of the Board of Psychology, in this action. I was assigned to handle this case on or around May 7, 2002.

3. As the Deputy Attorney General assigned to handle this case, I performed a wide variety of tasks that were necessary for the prosecution of this matter, including, but not limited to (1) conducting an initial case evaluation; (2) obtaining, reading and reviewing the

1 investigative material and requesting further investigation, as needed; (3) drafting pleadings,
2 subpoenas, correspondence, memoranda, and other case-related documents; (4) researching
3 relevant points of law and fact; (5) locating and interviewing witnesses and potential witnesses;
4 (6) consulting and/or meeting with colleague deputies, supervisory staff, experts, client staff, and
5 investigators; (7) communicating and corresponding with John Casenave, Esq., Respondent's
6 counsel and the Deputy District Attorney; (8) Appearing at the proceedings against respondent in
7 the criminal courts.

8 4. I am personally familiar with the time recording and billing practices of
9 DOJ and the procedure for charging the client agency for the reasonable and necessary work
10 performed on a particular case. Whenever work is performed on a case, it is the duty of the
11 employee to keep track of the time spent and to report that time on DOJ time sheets at or near the
12 time of the tasks performed. Based upon the time reported through October 26, 2002, DOJ has
13 billed or will bill the Board for the following amount of time spent working on the above entitled
14 case.

Employee/ Position	Fiscal Year	No. of Hours	Hourly Rate	Total Charges
Larry Mercer	2001-2002	13.25	\$112.00	\$1,484.00
Deputy Attorney General	2002-2003	58.00	112.00	<u>\$6,496.00</u>
				TOTAL: \$7,980.00

21 5. To the best of my knowledge the items of cost set forth in this certification
22 are correct and were necessarily incurred in this case.

23 I declare and certify that the foregoing is true and correct. Executed on
24 November 12, 2002, in the City of San Francisco, California.

25
26 
27 LAWRENCE A. MERCER
28 Declarant

DECLARATION OF SERVICE BY CERTIFIED MAIL

In the Matter of the Accusation Filed
Against:

Ian Wickram, Ph.D.

No. : W240

I, the undersigned, declare that I am over 18 years of age and not a party to the within cause; my business address is 1422 Howe Avenue, Ste. 22 Sacramento, California 95825. I served a true copy of the attached:

DEFAULT DECISION

by mail on each of the following, by placing same in an envelope (or envelopes) addressed (respectively) as follows:

NAME AND ADDRESS

CERT NO.

Ian Wickram, Ph.D.
2041 Superior Court
Tracy, CA 95304


7001 1940 0001 2974 7880

John Casenave, Esq.
Noonan & Casenave
121 East 11th Street
Tracy, CA 95376

Lawrence Mercer
Deputy Attorney General
455 Golden Gate Ave., Ste. 11000
San Francisco, CA 94102

Each said envelope was then on, December 18, 2002, sealed and deposited in the United States mail at Sacramento, California, the county in which I am employed, as certified mail, with the postage thereon fully prepaid, and return receipt requested.

Executed on, December 18, 2002, at Sacramento, California.
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



DECLARANT
Mary Laackmann
Enforcement Analyst